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1-12307

January 21, 2003

Mr. Brian Johnson
Branch Chief
Securities and Exchange Commission
Branch of Filer Support 2
Room 1004 -- STOP/1-4
450 Fifth Street, NW
Judiciary Plaza
Washington, DC 20549

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THOMSON FINANCIAL

Dear Mr. Johnson:

The New York Stock Exchange certifies approval for listing and registration under the Securities Exchange Act of 1934, ZIONS BANCORPORATION, Senior Floating Rate Notes Due January 15, 2005 and requests immediate acceleration of registration. Adequate distribution assured. Form 8-A received on January 21, 2003. Tentative listing date — January 23, 2003.

Sincerely,

Javas Iladlo